

**FILED**

AUG 19 2014

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

DAVID GREWS, CLERK  
BY *D. Adams* Deputy

UNITED STATES OF AMERICA

v.

CRIMINAL NO.: 1:14CR 093  
18 U.S.C. 1343

VERONICA RICE

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

1. From on or about January 1, 2010 to May 31, 2014, in the Northern District of Mississippi and elsewhere, VERONICA RICE, defendant, aided and abetted by others both known and unknown to the Grand Jury, did devise a scheme and artifice to defraud and for obtaining money by means of false and fraudulent pretenses and representations, and transmitted or caused to be transmitted by means of wire communication in interstate commerce writings, signs, signals, pictures and sounds for the purpose of executing the scheme and artifice:

**SCHEME TO DEFRAUD**

The following were parts of the scheme:

2. That VERONICA RICE and others operated a business known as CFNR Guide whereby they would contract with various businesses around the United States to produce and print guidebook publications that would be distributed to U. S. military personnel on U. S. Military bases respective to the victims' locations.

3. That VERONICA RICE and others would and did contract with individuals and businesses to sell advertising in these publications that would provide referral a list of local companies to U. S. military personnel and their families.

4. That VERONICA RICE and others would and did sell advertising space in CNFR Guide to individuals and businesses using fictitious names.

5. That VERONICA RICE and others would and did sell advertising space in CNFR Guide to individuals and businesses in various parts of the United States via interstate wire communications, by falsely representing to the individuals and business that they were affiliated with a local military base, by falsely representing that a guidebook publication would actually be published and would be distributed to military personnel at a local base, and by falsely representing that the publication was being produced as an aid to assist military families in locating needed services and vendors.

6. That VERONICA RICE and others would and did contract with commercial interstate carriers for the carriers to receive moneys paid by the individuals and businesses for advertising and for said carriers to send and delivery said moneys to VERONICA RICE and others in the Tupelo, Mississippi area by way of said interstate commercial carriers to expedite the deposit of advertisers' checks into bank accounts controlled by VERONICA RICE.

#### EXECUTION OF THE SCHEME

7. From on or about August 11, 2010 to on or about August 24, 2010, in the Northern District of Mississippi and elsewhere, for the purpose of executing the aforesaid scheme and artifice, VERONICA RICE, defendant, aided and abetted by others, did knowingly cause to be transmitted by means of wire communication in interstate commerce signals and sounds

containing false representations in order to fraudulently obtain a check in the amount of \$845.75 from Siems Advanced Lasik Center in Las Vegas, Nevada, in violation of Sections 2 and 1343, Title 18, United States Code.

## **COUNT TWO**

1. The Grand Jury re-alleges the scheme to defraud set out in paragraphs 1 through 7 of Count One of this Indictment.

2. On or about October 5, 2010, in the Northern District of Mississippi and elsewhere, for the purpose of executing the aforesaid scheme and artifice, VERONICA RICE, defendant, aided and abetted by others, did knowingly cause to be transmitted by means of wire communication in interstate commerce signals and sounds containing false representations in order to fraudulently obtain a check in the amount of \$900.00 from Maurice N. Ellis, Attorney at Law, located in Anchorage, Alaska, in violation of Sections 2 and 1343, Title 18, United States Code.

## **COUNT THREE**

1. The Grand Jury re-alleges the scheme to defraud set out in paragraphs 1 through 7 of Count One of this Indictment.

2. From on or about August 16, 2010 to on or about September 29, 2010, in the Northern District of Mississippi and elsewhere, for the purpose of executing the aforesaid scheme and artifice, VERONICA RICE, defendant, aided and abetted by others, did knowingly cause to be transmitted by means of wire communication in interstate commerce signals and sounds containing false representations in order to fraudulently obtain a check in the amount of

\$3,000.00 from Beazer Homes, located in Las Vegas, Nevada, in violation of Sections 2 and 1343, Title 18, United States Code.

**COUNT FOUR**

1. The Grand Jury re-alleges the scheme to defraud set out in paragraphs 1 through 7 of Count One of this Indictment.

2. From on or about August 11, 2010 to on or about August 18, 2010, in the Northern District of Mississippi and elsewhere, for the purpose of executing the aforesaid scheme and artifice, VERONICA RICE, defendant, aided and abetted by others, did knowingly cause to be transmitted by means of wire communication in interstate commerce signals and sounds containing false representations in order to fraudulently obtain a check in the amount of \$650.00 from Michael Olsen, Attorney at Law, located in Las Vegas, Nevada, in violation of Sections 2 and 1343, Title 18, United States Code.

A TRUE BILL

Redacted Signature  
Foreperson

*First Atty.* William C. Hunter, FAUSA  
UNITED STATES ATTORNEY